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10 *Attorneys for Defendant JE Dunn Construction
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14 **UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA**

16 UNITED STATES OF AMERICA, for the use
17 and benefit of SUSTAINABLE MODULAR
18 MANAGEMENT, INC., a Texas corporation,

19 Plaintiff,

20 vs.

21 JE DUNN CONSTRUCTION
22 COMPANY; FEDERAL INSURANCE
23 COMPANY; HARTFORD FIRE
24 INSURANCE COMPANY; TRAVELERS
CASUALTY AND SURETY COMPANY
OF AMERICA; DOE Individuals I-X and
ROE Entities I-X, inclusive,

25 Defendants.

26 Case No.: 2:20-cv-00790-JAD-NJK

27 Compl. Filed: May 1, 2020

28 **STIPULATION TO EXTEND
ALL DEFENDANTS' TIME TO
RESPOND TO COMPLAINT**

29 **(FIRST REQUEST)**

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31 This Stipulation to Extend all Defendants' Time to Respond to Complaint is made
32 by and between Plaintiff United States of America, for the use and benefit of Sustainable
33 Modular Management, Inc. ("Plaintiff") and Defendant JE Dunn Construction Company
34 ("JE Dunn") through their respective counsel, in light of the following facts:

35 **RECITALS**

36 A. Plaintiff filed the Complaint ("Complaint") against JE Dunn on or about
37 May 1, 2020.
38 B. JE Dunn was served with the Complaint on May 13, 2020.

1 C. JE Dunn's current deadline to respond to the Complaint is June 3, 2020.
2 D. Federal Insurance Company has not yet been served.
3 E. Hartford Fire Insurance Company was served with the Complaint on May
4 13, 2020.

5 F. Hartford Fire Insurance Company current deadline to respond to the
6 Complaint is June 3, 2020.

7 G. Travelers Casualty and Surety Company of America was served with the
8 Complaint on May 13, 2020.

9 H. Travelers Casualty and Surety Company of America current deadline to
10 respond to the Complaint is June 3, 2020.

11 I. The parties agreed that JE Dunn shall have until June 17, 2020, to respond
12 to the Complaint in order to give JE Dunn time to investigate Plaintiff's claims and
13 prepare a proper response. Additionally, the remaining defendants have, or are expected
14 to, tender defense of these claims to JE Dunn and counsel for JE Dunn expects to
15 represent all Defendants. The parties agreed that the additional time will allow
16 Defendants to finalize these arrangements so that individual answers may not be required.

17 J. Accordingly, the parties further agree that the deadline for all Defendants
18 to respond to the Complaint will be June 17, 2020.

19 K. There is good cause to grant this stipulation because JE Dunn requires
20 additional time to investigate Plaintiff's claims, prepare a proper response on behalf of JE
21 Dunn and the remaining Defendants.

22 L. This stipulation is filed in good faith and not intended to cause delay.

23 M. Pursuant to Local Rule IA 6-2, Plaintiff and JE Dunn respectfully request
24 that the Court extend all Defendants' time to respond to Plaintiff's Complaint through
25 June 17, 2020.

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STIPULATION

NOW, THEREFORE, Plaintiff and JE Dunn hereby stipulate and agree that JE Dunn and all Defendants have up to and including June 17, 2020, to file a response to Plaintiff's Complaint.

IT IS SO STIPULATED.

DATED this 3rd day of June, 2020.

DATED this 3rd day of June, 2020.

MORRIS LAW GROUP

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JE Dunn Construction Company*

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

United States Magistrate Judge

DATED June 4, 2020